

FENNEMORE CRAIG, P.C.
Shannon S. Pierce, NV Bar No. 12471
Wade Beavers, NV Bar No. 13451
300 E. Second Street, Suite 1510
Reno, Nevada 89501
Tel: (775) 788-2200 Fax: (775) 786-5000
Email: spierce@fclaw.com; wbeavers@fclaw.com

Attorneys for Defendant
CORNER INVESTMENT COMPANY LLC dba
THE CROMWELL

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CRAIG DELLANEVA, an individual,

Plaintiff,

v.

CORNER INVESTMENT COMPANY
d/b/a THE CROMWELL, a Nevada
Corporation,

Defendant.

CASE NO. 2:19-cv-00437-JCM-VCF

**STIPULATION TO EXTEND DEADLINE
TO RESPOND TO COMPLAINT**

(First Request)

WHEREAS, on March 14, 2019, Plaintiff Craig Dellaneva ("Plaintiff") filed his Complaint in the instant action;

WHEREAS, based on the date of service of process, Defendant Corner Investment Company, LLC dba The Cromwell's ("Defendant") response to Plaintiff's Complaint is currently due on **April 8, 2019**;

WHEREAS, due to the workload of defense counsel, Defendant has requested, and Plaintiff has granted, a two-week extension of the responsive pleading deadline, such that the new responsive pleading deadline would be **April 22, 2019**;

WHEREAS, this is the first stipulation or request for extension of any deadline by any party in this case;

1 NOW THEREFORE, based on the foregoing, the parties, by and through their respective
2 counsel of record, hereby STIPULATE and agree to allow Defendant a two-week extension, to and
3 including April 22, 2019, to file a responsive pleading in response to Plaintiff's Complaint.

4 This stipulation and order is sought in good faith and not for the purpose of delay.

5 IT IS SO STIPULATED.

6 DATED: April 8, 2019.

7 FENNEMORE CRAIG, P.C.

LEAVITT LEGAL GROUP, P.C.

8 By: /s/ Shannon S. Pierce
9 Shannon S. Pierce (NV Bar No. 12471)
10 Wade Beavers (NV Bar No. 13451)
11 300 East Second Street - Suite 1510
12 Reno, Nevada 89501
13 Attorneys for Defendants
14 CORNER INVESTMENT COMPANY LLC
15 dba THE CROMWELL

By /s/ Kristofer D. Leavitt
Kristofer D. Leavitt, (NV Bar No. 13173)
612 S. 10th Street
Las Vegas, NV 89101
Attorneys for Plaintiff
CRAIG DELLANEVA

16 IT IS SO ORDERED.



17 U.S. MAGISTRATE JUDGE

18 DATED this 8th day of April, 2019.

CERTIFICATE OF SERVICE

I certify that I am an employee of FENNEMORE CRAIG, P.C., and that on this date, pursuant to Fed.R.Civ.P.5(b), I am serving a true and correct copy of the attached **STIPULATION TO EXTEND DEADLINE TO RESPOND TO COMPLAINT (First Request)** on the parties set forth below by:

- _____ Placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Reno, Nevada, postage prepaid, following ordinary business practices
- _____ Certified Mail, Return Receipt Requested
- _____ Via Facsimile (Fax)
- _____ Placing an original or true copy thereof in a sealed envelope and causing the same to be personally Hand Delivered
- _____ Federal Express (or other overnight delivery)
- XX Via the Court's CM/ECF system

addressed as follows:

Kristofer D. Leavitt, Esq.
Leavitt Legal Group, P.C.
612 S. 10th Street
Las Vegas, NV 89101
kleavitt@leavittlegalgroup.com

Attorneys for Plaintiff

DATED this 8th day of April, 2019.

/s/ Debbie Sorensen
An employee of FENNEMORE CRAIG, P.C.